



Bay-Friendly Landscape and Garden Coalition

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26 June 2015

California Department of Water Resources
Urban Water Use Efficiency Unit
ATTN: Julie Saare-Edmonds, Senior Environmental Scientist
P.O. Box 942836
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Email: Julie.Saare-Edmonds@water.ca.gov

Dear Julie;

Bay-Friendly Coalition appreciates the opportunity to comment on the draft MWEL. It is obvious how much work and thought has gone in to these proposed ordinances by a diverse group of stakeholders. Bay-Friendly's comments are as follows:

490.1.a: We have concerns about moving the new threshold down to 500 sq ft. We have not seen the ability to enforce WEL on small projects, either done by homeowners or small landscapers. The even smaller areas now being considered will lead to more non-compliance and non-enforcement. Simple educational sheets describing WEL and its goals, "Best Practices", and where to get further information would be more effective. These should be in English and Spanish and for home owners and for small landscapers; they could be e-mailed, put in water agencies bills, and distributed where plants and irrigation are sold.

492.16(e) is reasonable, but ought to be a requirement rather than a recommendation. The avoidance of waste requires the treatment of rainwater and stormwater as resources. We believe on-site retention is vital and should be required, including rainwater catchment and stormwater retention.

We also recommended that projects include on-site stormwater retention such as:

- All graded projects drain to vegetated areas for maximum on-site water retention.
- Pervious surfaces that minimize runoff be used whenever possible.
- Incorporate rain gardens, cisterns, and other rain harvesting or catchment.
- Consider constructed wetlands and retention ponds that retain water, handle excess flow, and filter pollutants.

492.6.g reads, "Organic mulch materials should take precedence over inorganic materials in instances where it is suitable, ecologically possible, and the material does not pose a fire hazard. Composted organic material, in particular that which includes post-consumer material, should be considered over more compacted products such as bark, wood chips, etc.," we encourage adding text about sheet mulching with cardboard and LOCAL arbor chip mulch could be added, and also text added disallowing gorilla hair as mulch. Bay-Friendly fully supports soil preparation for all new landscapes to maximize water retention and infiltration.

492.6.a.3.C: Currently reads, "compost at a rate of a minimum of four cubic yards per 1,000 square feet of permeable area (unless contra-indicated by soil test) shall be incorporated to a depth of six inches into the soil. Soils with greater than 25% organic matter in the top 6 inches of soil are exempt from adding compost." We suggest that it should not be a requirement for compost to be incorporated into the top 6" of soil, instead the language should be changed to allow for sheet mulching, where the compost, cardboard and mulch is placed over a lawn or over undisturbed soil in a no-till situation. With a no-till or lawn sheet mulching application the compost will be naturally incorporated into the soil through action of microbes. We recommend that compost be incorporated to a depth of 9 inches.

492.15-16: We are supportive of anything promoting rain water capture and infiltration, gray water use, and recycled water.

495: We are concerned that jurisdictions have a difficult time keeping records of WELO enforcement, and hope DWR will restructure the process and provide reporting infrastructure.

Thank you for your work, and for the opportunity to comment.

Sincerely,

Ann-Marie Benz

Ann-Marie Benz
Executive Director